

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 286-1255



November 1, 1993
File Nos. 2199.9079(LWT)
2179.7125
2139.3094

Ms. Barbara Ransom
Environmental Affairs Manager
Cargill Salt
P.O. Box 364
7200 Central Avenue
Newark, CA 94560

Subject: Administrative Extension of NPDES Permit Nos. CA0028703, CA0028690, and CA0028681

Dear Ms. Ransom:

We have reviewed your applications for permit reissuance for the storm water discharges from the Newark, Redwood City, and Napa facilities dated May 17, 1993, and supplemented by letter of June 17, 1993. We find your application generally complete, but request additional information described below to facilitate development of the new permit conditions which are scheduled for consideration in the first calendar quarter of 1994. Your existing permits expire on November 16, 1993. Pursuant to 40 CFR 122.6(d), the NPDES permits specified in Order Nos. 88-162, 88-163, and 88-164, are continued in effect until the Board adopts new permits for the discharges.

Please submit the following information to us by December 31, 1993:

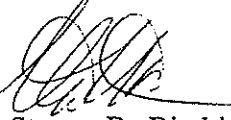
1. Latitude and longitude coordinates of all the discharge points.
2. Site drainage maps for each facility outlining the drainage areas for each discharge point.
3. All available analytical results for the discharges described in your letter of June 17, 1993.
4. The Storm Water Pollution Prevention Plans for all three facilities.
5. A report on the results of the investigations described in your letter of May 17, 1993.

Ms. Ransom
page 2

November 1, 1993

If you have any questions, please contact Lila Tang at (510) 286-0911.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steve Ritchie", with a long horizontal flourish extending to the left.

Steven R. Ritchie
Executive Officer

CARGILL
SALT DIVISION

7200 Central Ave.
Newark, CA 94560-4206
510/797-1820 1-800-321-1458
Admin FAX: 510/790-8162
Plant FAX: 510/790-8189

CERTIFIED MAIL NO. P 477 484 905

May 17, 1993

Mr. Steve Ritchie
Executive Officer
CA Regional Water Quality Control Board
S.F. Bay Region
2101 Webster Street
Suite 500
Oakland, CA 94612

Dear Mr. Ritchie:

Please find attached applications to renew our NPDES permits for stormwater discharge from our salt crystallizer beds at the Newark, Redwood City and Napa facilities.

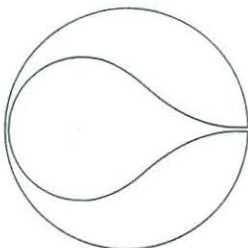
On May 6, 1993, we met with your staff to discuss changes in the NPDES permit that might be acceptable in the future permit. Therefore, with this submittal, we are requesting the following changes in the NPDES permits.

1. Discharge Location

We are requesting to have two discharge locations available to us at our Newark facility. Our current permit allows us to discharge at Mowry Slough. Due to siltation of this slough, it has become difficult to discharge at this location. Consequently, we would like to have the option of discharging at another location, Plummer Creek. No construction of any new structures or ditches would be necessary to achieve discharge at this location; existing structures and ditches would be used.

2. Sample Collection Location

As we discussed with your staff, it is difficult, if not impossible for us to take samples of the discharging rain water on the slough side of the pipe. The pipe is almost always underwater. If we take a sample it would contain slough water. We would like to take the sample at the closest and most practical location on the facility side of the discharge pipe. We could also add that the representative sample be taken within 15 minutes of the discharge. Of course, prior to any discharge, the salinity and pH measurement would have to meet our current requirements.



Application in file
2198.9079

Also, as we discussed with your staff, we are investigating some anomalies discovered in this year's rainwater discharges. These investigations include:

1. Correlating our Baume or salometer reading at low salinities with TDS measurements.
2. Investigating source of high pH in this rainwater.
3. Investigating hardware, pumps, grounding probes as potential sources of the elevated zinc we saw in last year's rainwater.
4. Next season take a sample of the rainwater before it hits the ground to determine background levels of metals in the rainwater.

We plan to submit a comprehensive report on the results of this investigation to the RWQCB.

Please call if you have any questions or need additional information.

Sincerely,



Barbara N. Ransom
Manager, Environmental Affairs

BNR/tb

cc: John Pyles
Dave Graves
Ken Mello
Bob Edgecomb